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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 UNITED STATES OF AMERICA,) Case No.: CR 11-0625 EMC
)
13 Plaintiff,) STIPULATION AND [PROPOSED]
) ORDER CONTINUING STATUS
14 vs.) HEARING
)
15 BASSAM SALMAN,)
)
16 Defendant.)
17 _____)

18
19 Plaintiff, by and through its attorney of record, Adam Reeves, and defendant, by and
20 through his attorney of record, Gail Shifman, hereby stipulate and ask the Court to find as
21 follows:
22

23 1. That the parties are currently scheduled for a status hearing date of April 25, 2012 at
24 2:30 p.m. This date was set by Clerk's Notice continuing the originally scheduled status hearing
25 date of April 18, 2012. Defense Counsel has a scheduling conflict on the continued date of April
26 25, 2012, appearing before the Honorable Phyllis Hamilton, in United States vs. Asim Waqar,
27

28 STIPULATION & [PROPOSED] ORDER
CONTINUING STATUS HEARING

1 CR 11-0464 PJH.

2 2. That counsel for the defendant requests that the Court vacate the April 25, 2012 status
3 hearing date and continue it until May 9, 2012 at 2:30 p.m. and counsel for the United States
4 does not object to this request.

5 3. That the parties agree that the failure to grant such a continuance would unreasonably
6 deny counsel the reasonable time necessary for effective preparation and continuity of counsel,
7 taking into account the exercise of due diligence and that April 18, 2012 through May 9, 2012
8 should be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §
9 3161(h)(7)(A), on the basis that the ends of justice are served by taking such action which
10 outweigh the best interest of the public and the defendant in a speedy trial and also under
11 subsection (B)(iv) for effective preparation of counsel, taking into account the exercise of due
12 diligence.
13
14

15 Dated: March 20, 2012

_____/s/
Adam Reeves
Assistant United States Attorney

17
18 Dated: March 20, 2012

_____/s/
Gail Shifman
Attorney for Defendant Bassam Salman

20
21 **[PROPOSED] ORDER**
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23 This matter having come before the Court upon the Stipulation of the parties and GOOD
24 CAUSE APPEARING,

25 IT IS ORDERED That the April 25, 2012 status hearing date shall be vacated and
26 continued until May 9, 2012 at 2:30 p.m.;

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28 STIPULATION & [PROPOSED] ORDER
CONTINUING STATUS HEARING

1 IT IS FURTHER ORDERED that the time from April 18, 2012 through May 9, 2012
2 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§
3 3161(h)(7)(A) and (B)(iv), to provide the defense time to review discovery and for effective
4 preparation and for continuity of counsel. The Court finds that (A) failure to grant the
5 continuance would unreasonably deny defendants the reasonable time necessary for effective
6 preparation, taking into account the exercise of due diligence; and (B) the ends of justice served
7 by the continuance outweigh the best interests of the public and the defendants in a speedy trial.
8 See 18 U.S.C. § 3161(h)(1)(7)(A) & (B)(iv).

9
10 Dated: March 23, 2012

